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Attorneys for Defendant
SHENZHEN HIGH POWER
TECHNOLOGY CO. LTD.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ENERGIZER S.A.,

Plaintiff,

Against

M/V YM GREEN her engines, boilers and
Tackle *in rem*; YANG MING MARINE
TRANSPORT CORP.; YANGMING (UK) LTD.;
ALL OCEANS TRANSPORTATION INC.;
KAWASAKI KISEN KAISHA LTD.; CONTERM
HONG KONG LTD.; VANGUARD LOGISTICS
SERVICES HONG KONG LTD.;
FIEGE GOTH CO., LTD.; and SHENZHEN
HIGH POWER TECHNOLOGY CO. LTD.

Defendants.

: 07 CV 7406 (LTS)

: ECF CASE

: **ANSWER TO CONTINGENT
CROSS-CLAIM OF
DEFENDANT ALL OCEANS
TRANSPORTATION INC.**

-----X

Defendant SHENZHEN HIGH POWER TECHNOLOGY CO. LTD. ("High Power"), by its attorneys Kardaras & Kelleher LLP, as and for its answer to contingent cross-claim of defendant All Oceans Transportation Inc. ("All Oceans") contained in its answer to plaintiff's complaint, alleges upon information and belief as follows:

1. Denies the allegations contained in paragraph 47 and 50 of the contingent cross-claim of defendant All Oceans.

2. Denies each and every allegation contained in paragraphs 48, 53 and 54 of the contingent cross-claim of defendant All Oceans insofar as it refers to defendant High Power, and denies knowledge and information sufficient to form a belief as to any of the allegations as to the remaining defendants.

3. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraphs 49, 51, 52 and 55 of the contingent cross-claim of defendant All Oceans.

AS AND FOR A FIRST AFFIRMATIVE DEFENSE

4. Defendant High Power claims the benefit of all defenses raised by co-defendants and plaintiff in its response to cross-claims and counterclaims as well as its defenses set forth in its answer to plaintiff's complaint insofar as said defenses may be applicable to defendant High Power.

WHEREFORE, Defendant High Power prays that the contingent cross-claim of defendant All Oceans be dismissed with prejudice, together with costs, disbursements and attorney's fees and for such other and additional relief as to the Court may seem just and proper.

Dated: New York, NY
February 28, 2008

Respectfully submitted,

KARDARAS & KELLEHER, LLP
44 Wall Street
New York, NY 10005
Attorneys for Defendant
SHENZHEN HIGH POWER
TECHNOLOGY CO. LTD.

By:


William P. Kardaras (WK-8835)

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CERTIFICATE OF SERVICE BY REGULAR U.S. MAIL AND BY ECF

The undersigned declares under penalty of perjury that the following is true and correct:

1. I am over the age of eighteen years and I am not a party to this action.
2. On February 28, 2008, I served a complete copy of SHENZHEN HIGH POWER TECHNOLOGY CO. LTD.'s Answer to Contingent Cross-Claim of Defendant All Oceans Transportation Inc. by regular U.S. mail and/or by ECF, to the following attorneys at their respective ECF registered address and/or at the following address:

HILL RIVKINS & HAYDEN LLP
Attorneys for Plaintiff
45 Broadway, Suite 1500
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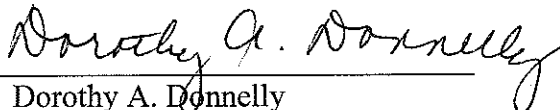
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Dated: New York, New York
February 28, 2008


Dorothy A. Donnelly